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2 17702 Mitchell North,
3 Irvine, CA 92614
4 Telephone: 949-307-2426
Facsimile: 949-756-9060
werksmanlaw@gmail.com

5 Attorney for Defendant Jean Francois Picard

6 **UNITED STATES DISTRICT COURT**
7 **SOUTHERN DISTRICT OF CALIFORNIA**
8

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 JEAN FRANCOIS PICARD (2),

13 Defendant.
14
15
16

Criminal Case No. 16cr1409-H

**DEFENDANT'S MOTION TO DISMISS THE
INDICTMENT DUE TO OUTRAGEOUS
GOVERNMENT CONDUCT IN OBTAINING
JURISDICTION, ENTRAPPING
DEFENDANT, ENHANCING POSSIBLE
SENTENCING AND CREATING THE
CRIMINAL ACTS**

17
18 Now comes Defendant, Jean Francois Picard, by his attorney, Gerald M. Werksman, and moves
19 this court for an order dismissing the indictment because of outrages government conduct, and in
20 support thereof, states as follows:

21 **THE FACTS**

22 In order to make a case against the Defendant, J. F. Picard, the F.B.I.

- 23 1. Created four fictitious patients ,to-wit: Michael R. McCorrel (Count 2, Def. Exhibit 1);
24 John P. Michaels (Count 3, Def. Exhibit 2); Jack P. McMiken (Count 4, Exhibit 3);
25 AND Michael McCarren (Counts 5 and 6.)
26 2. Used the prescription pads supplied by an informant to write prescriptions for four items
27 used by "Workers Compensation Only" (see items 11 through 15 on each prescription.)
28 3. Had an F.B.I. agent, Catherine Connelly, sign the name of the allegedly prescribing
doctor (Harry Donel Elshore) to the prescription. (See Def. Exhibit 4)

DEFENDANT'S MOTION TO DISMISS THE INDICTMENT DUE TO OUTRAFES GOVERNMENT CONDUCT IN OBTAINING
JURISDICTION, ENTRAPPING DEFENDANT, ENHANCING POSSIBLE SENTENCING AND CREATING THE CRIMINAL
ACTS

4. Submitted the prescriptions to co-defendant Melamed for filling
5. Designated each of the fictitious patients as a U.S. Postal Worker with a job-related injury and a return address in the Southern District; each address was an F.B.I.-controlled mailbox in the Southern District.

By running the operation from beginning to end, the F.B.I. agents did the following, attributed to Picard in the Indictment: (a) made materially false and fraudulent representations in the prescriptions which they created; (b) made it appear that the defendant was depriving the patients and doctors of the doctor's honest services; (c) Violated the Travel Act by sending a check for the informant to Nevada to a F.B.I. mail drop box; (d) MOST importantly, by creating the patients, doctors, diagnoses, and medical visits, the government has made it impossible for the defendant to contradict the "FRAUDULENT PURPOSE" set forth in Count One at page 5, paragraph 15 of the indictment:

"...a secret pattern of bribes to doctors (and those acting with them and on their behalf), to induce the doctors to refer patients to particular pharmacies and DME providers, in violation of the doctors' fiduciary duty to their patients."

To create Counts 13 and 14, the agents had the informant send a check for his commission to an entity in Nevada which was set up solely for the purpose of creating Travel Act Violations. (Ex. 5)

Genesis of the case against the Defendant began some time in 2012 when the F.B.I. apprehended Paul Randall who was involved in a major medical frauds all over Southern California, involving hospitals, clinics and doctors. Randall hardly knew the defendant, nor had he ever done business with him, but in an effort to mitigate a lengthy sentence (although indicted in 2013 Randall has yet to be sentenced, to counsel's knowledge) Randall became an informant.

The informant, Paul Randall, had never done business with J.F. Picard. He knew Picard slightly as a former professional hockey player who was a distributor for orthopedic medical services, for which a commission to the sales representative was legal. The problem was that the defendant had a miniscule portion of business in California and none in The Southern District. The above plan to make a case against the defendant evolved. What is perplexing to defense counsel is the role of the prosecutor in what occurred. Since the documents attached as Exhibits 1, 2 and 3 were not provided in the pretrial discovery, but come from defendant's records, it is fair to ask whether the prosecutor knew of the

1 Bureau's machinations. Did the grand jury know that the patients were fictitious; the scripts phoned up
 2 and signed by an F.B.I. agent? Did anyone consider the impossibility of defense counsel asking whether
 3 the alleged doctors were bribed as set forth in Count One, the conspiracy count.

4 THE LAW

5 Dismissal of an indictment has long been considered the appropriate action by a trial court
 6 where government conduct is so outrageous that it offends the universal sense of justice. Whether it
 7 be to entrap a defendant, create jurisdiction or increase sentencing penalties, there is certain conduct that
 8 is forbidden. See, United States v. Fernandez, 388 F.3d 1199, 1237(9th Cir.2004). Especially is this so
 9 "...when the government has 'engineered and dictated the criminal enterprise from start to finish,' United
 10 States v. Smith, 924 F2d 889, 897(9th Cir. 1991),...". Fernandez at 11237. See also: United States v. So,
 11 755 F2d 1350, 1352(9th Cir. 1985): "We can assume that our sense of justice would be shocked were
 12 'government agents {to} engineer and direct {a} criminal enterprise from start to finish.' United States v.
 13 Ramirez, 710F.2d 535, 539 (9th Cir. 1983)."

14 Courts have sanctioned dismissal of prosecutions where the prosecutor has manufactured or
 15 obtained jurisdiction. United States v. Struckman, 611F/3d 560, 570-574(9th Cir. 2010). The claim, as
 16 made here, is limited to "extreme cases"...characterized by 'dominant fomentation' or aggressive
 solicitation of criminal activity.

17 This court is no stranger to the arguments presented here, having been affirmed in United States
 18 v. Ross, 372F.3d 1097(2004). However, we call to the court's attention two more recent cases, each
 19 with a persuasive and well-reasoned dissent by Judge Noonan. They are: United States v. Black,
 20 733F.3d 294(9th Cir. 2013) and United States v. Pedrin, 797 F.3f 792(9th Cir. 2015).

21 The majority opinions in both of the above cases adopted a list, not necessarily formulistic, of six
 22 factors relevant to identifying outrageous government conduct which should result in dismissal of an
 23 indictment. Black at page 30 and Pedrin at page 786. The court in Pedrin listed those factors as:


24 "(1) known criminal characteristics of the defendants; (2) individualized suspicion of the
 25 defendants; (3) the government's role in creating the crime conviction; (4) the government's
 26 encouragement of the defendants to commit the offense conduct; (5) the nature of the
 27 government's participation in the offense conduct; (6) the nature of the crime being pursued and
 28 necessity for the actions taken in light of the nature of the criminal enterprise at issue."

1 In the instant case, all six factors weigh in Defendant Picard's favor.

2 **CONCLUSION**

3 Wherefore, for the foregoing reasons, Defendant moves this court for an order dismissing
4 the indictment.

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7 Respectfully submitted,

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9 Gerald M. Werksman
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PRESCRIPTION ORDER FORM

FAX RX TO: (877) 386-4043

24/7 PHARM SUPPORT: (214) 273-1644

PATIENT INFORMATION:

☒ WORKERS' COMPENSATION ☐ P.I./AUTO/PIP ☐ PPO ☐ MEDICARE
 PATIENT NAME: Michael B. McCorrel DATE OF BIRTH: 3/28/76 PREFERRED LANGUAGE: English
 ADDRESS: 9880 N. Magnolia Ave #387 PHONE: Santee, CA 92071 ALLERGIES: None

PLEASE INCLUDE DEMOGRAPHICS AND COPY OF INSURANCE WITH THIS FORM

ANTI-INFLAMMATORY CREAMS

1. ☐ MUSCULOSKELETAL PAIN, OSTEOARTHRITIS, EPICONDYLITIS
FLURBUPROFEN 20%, BACLOFEN 2%, CYCLOBENZAPRINE 2%, LIDOCAINE 2%
2. ☐ MUSCULOSKELETAL PAIN & INFLAMMATION
FLURBUPROFEN 20%, BACLOFEN 2%, CYCLOBENZAPRIN 2%, GABAPENTIN 6%, LIDOCAINE 2%
3. ☐ TENDINOSIS, STRICTURE & SCARRING
FLURBUPROFEN 20%, BACLOFEN 2%, VERAPAMIL 10%

SIG: APPLY 1-2 GRAMS TO AFFECTED AREA 3-4 TIMES PER DAY

Please Circle:

QTY: 120 GM 180 GM 240GM

REFILLS: 1

NEUROPATHIC PAIN AND POST-HERPETIC NEURALGIA

4. ☐ TRIGEMINAL NEURALGIA, PHANTOM LIMB, DEVELOPING NEUROPATHY
KETAMINE 10% (C-III), GABAPENTIN 6%, IMIPRAMINE 3%, LIDOCAINE 2%, MEFENAMIC ACID 1%, CLONIDINE 0.2%,
5. ☐ DIABETIC & CHEMOTHERAPY-INDUCED PERIPHERAL NEUROPATHY
KETAMINE 10% (C-III), GABAPENTIN 6%, IMIPRAMINE 3%, LIDOCAINE 2%, NIFEDIPINE 2%, BACLOFEN 2%,
6. ☐ SHINGLES
KETAMINE 10% (C-III), LIDOCAINE 2%, ACYCLOVIR 5%, DDG 0.1%, AMITRIPTYLINE 2%, KETOPROFEN 10%
7. ☐ FAILED BACK SYNDROME, RADICULOPATHY, FIBROMYALGIA
KETAMINE 10% (C-III), BACLOFEN 2%, CYCLOBENZAPRINE 2%, KETOPROFEN 10%, GABAPENTIN 6%, LIDOCAINE 2%

MISCELLANEOUS PRODUCTS

8. ☐ SPRIX NASAL SPRAY (SIG: 1 SPRAY IN EACH NOSTRIL EVERY 6-8 HOURS AS NEEDED FOR PAIN)
FOR THE SHORT TERM (>5 DAYS) RELIEF OR MODERATE TO MODERATELY SEVERE PAIN
9. ☐ REJUVENESS SCAR SILICONE SHEETING (SIG: APPLY 1 SHEET OVER SCAR)
A PROVEN CLASS 1 MEDICAL DEVICE FOR TREATING AND PREVENTING PROBLEM SCARRING
10. ☐ NIP PROCEDURE DEVICE (SIG: DEVICE IS PLACE BEHIND THE EAR OF THE PATIENT FOR 4 DAYS)
NON-DRUG TREATMENT FOR PAIN WITH LITTLE OR NO SIDE-EFFECTS

WORKERS COMPENSATION ONLY

11. ☒ TEROCIN:
CAPSAICIN 0.025%, METHYL SALICYLATE 25%, MENTHOL 10%, LIDOCAINE 2.5% - 240ML
12. ☒ PRO-K
KETOPROFEN 20%, LIDOCAINE 5% - 180GM
13. ☒ GENICIN: (SIG: TAKE 1 CAPSULE BY MOUTH 3 TIMES DAILY)
GLUCOSAMINE SODIUM 500MG - 90 CAPSULES
14. ☒ SOMNICIN: (SIG: TAKE 1-2 CAPSULE BY MOUTH AT BEDTIME)
MELATONIN 2MG, 5-HYDROXYTRYPTOPAN 50MG, L-TRYPTOPHAN 100MG, PYRIDOXINE 10MG, MAGNESIUM 50MG - 60 CAPSULES
15. ☒ OXACIN: (SIG: TAKE 2 TABLETS BY MOUTH 2 TIMES DAILY *MAX IS 4 TABLETS*)
DOCUSATE SODIUM 50MG, SENNOSIDES 8.6MG - 100 TABLETS

PRESCRIBER INFORMATION

NAME (PRINT): Harry Donel Elshire NPI#: 13746618389 DEA#: FE 3248829 LIC#: A40737
 ADDRESS: 34730 Bob Wilson Dr, San Diego PHONE: 658 740 8700 FAX:
 PRESCRIBER'S SIGNATURE: [Signature] DATE: 3/19/13

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DEF EX1



PRESCRIPTION ORDER FORM

FAX RX TO: (877) 386 4043

24/7 PHARM SUPPORT 1-811-777-1634

PATIENT INFORMATION:

PATIENT NAME: John P. McMichaels	WORKERS' COMPENSATION <input checked="" type="checkbox"/> P.I./AUTO/PIP <input type="checkbox"/> PPO <input type="checkbox"/> MEDICARE <input type="checkbox"/>
DATE OF BIRTH: 6/24/73	PREFERRED LANGUAGE: English
ADDRESS: 3529 Cannon Rd 2B Apt 320	PHONE: Oceanside, CA 92056
ALLERGIES: None	

PLEASE INCLUDE DEMOGRAPHICS AND COPY OF INSURANCE WITH THIS FORM

ANTI-INFLAMMATORYS

1. ☐ MUSCULOSKELETAL PAIN, OSTEOARTHRITIS, EPI CONDYLITIS
FLURBUPROFEN 20%, BACLOFEN 2%, CYCLOBENZAPRINE 2%, LIDOCAINE 2%
2. ☐ MUSCULOSKELETAL PAIN & INFLAMMATION
FLURBUPROFEN 20%, BACLOFEN 2%, CYCLOBENZAPRIN 2%, GABAPENTIN 6%, LIDOCAINE 2%
3. ☐ TENDINOSIS, STRICTURE & SCARRING
FLURBUPROFEN 20%, BACLOFEN 2%, VERAPAMIL 10%

SIG: APPLY 1-2 GRAMS TO AFFECTED AREA 3-4 TIMES PER DAY

Please Circle:

QTY: 120 GM 180 GM 240GM

REFILLS: 1

NEUROPATHIC PAIN AND POST HERPLECTIC NEURALGIA

4. ☐ TRIGEMINAL NEURALGIA, PHANTOM LIMB, DEVELOPING NEUROPATHY
KETAMINE 10% (C-III), GABAPENTIN 6%, IMIPRAMINE 3%, LIDOCAINE 2%, MEFENAMIC ACID 1%, CLONIDINE 0.2%
5. ☐ DIABETIC & CHEMOTHERAPY-INDUCED PERIPHERAL NEUROPATHY
KETAMINE 10% (C-III), GABAPENTIN 6%, IMIPRAMINE 3%, LIDOCAINE 2%, NIFEDIPINE 2%, BACLOFEN 2%,
6. ☐ SHINGLES
KETAMINE 10% (C-III), LIDOCAINE 2%, ACYCLOVIR 5%, DDG 0.1%, AMITRIPTYLINE 2%, KETOPROFEN 10%
7. ☐ FAILED BACK SYNDROME, RADICULOPATHY, FIBROMYALGIA
KETAMINE 10% (C-III), BACLOFEN 2%, CYCLOBENZAPRINE 2%, KETOPROFEN 10%, GABAPENTIN 6%, LIDOCAINE 2%

MISCELLANEOUS PRODUCTS

8. ☐ SPRIX NASAL SPRAY (SIG: 1 SPRAY IN EACH NOSTRIL EVERY 6-8 HOURS AS NEEDED FOR PAIN)
FOR THE SHORT TERM (>5 DAYS) RELIEF OR MODERATE TO MODERATELY SEVERE PAIN
9. ☐ REJUVENESS SCAR SILICONE SHEETING (SIG: APPLY 1 SHEET OVER SCAR)
A PROVEN CLASS 1 MEDICAL DEVICE FOR TREATING AND PREVENTING PROBLEM SCARRING
10. ☐ NIP PROCEDURE DEVICE (SIG: DEVICE IS PLACE BEHIND THE EAR OF THE PATIENT FOR 4 DAYS)
NON-DRUG TREATMENT FOR PAIN WITH LITTLE OR NO SIDE-EFFECTS

WORKERS COMPENSATION ONLY

11. ☒ TEROCIN:
CAPSAICIN 0.025%, METHYL SALICYLATE 25%, MENTHOL 10%, LIDOCAINE 2.5% - 240ML
12. ☒ PRO-K
KETOPROFEN 20%, LIDOCAINE 5% - 180GM
13. ☒ GENICIN: (SIG: TAKE 1 CAPSULE BY MOUTH 3 TIMES DAILY)
GLUCOSAMINE SODIUM 500MG - 90 CAPSULES
14. ☒ SOMNICIN: (SIG: TAKE 1-2 CAPSULE BY MOUTH AT BEDTIME)
MELATONIN 2MG, 5 HYDROXYTRYPTOPAN 50MG, L TRYPTOPHAN 100MG, PYRIDOXINE 10MG, MAGNESIUM 50MG - 60 CAPSULES
15. ☒ LAXACIN: (SIG: TAKE 2 TABLETS BY MOUTH 2 TIMES DAILY "MAX IS 4 TABLETS")
DOCUSATE SODIUM 50MG, SENNOSIDES 8.6MG - 100 TABLETS

PRESCRIBER INFORMATION

NAME (PRINT): Harry Donel Elshire	NPI#: 1376618389	DEA#: 324 8829	LIC#: A407 37
ADDRESS: 34730 Bob Wilson Dr, San Diego	PHONE: 858 740 8700	FAX:	
PRESCRIBER'S SIGNATURE: [Signature]		DATE: 3/29/13	

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DEF EX. 2



PRESCRIPTION ORDER FORM

FAX RX TO: (877) 386-4043

24/7 PHARM SUPPORT 1-811-272-1613

PATIENT INFORMATION:

PATIENT NAME: <u>Jack P. McMillen</u>	DATE OF BIRTH: <u>3/24/78</u>	PREFERRED LANGUAGE: <u>English</u>
ADDRESS: <u>1611-A South Melrose Drive #207 Vista, CA 92081</u>	PHONE: <u></u>	ALLERGIES: <u>None</u>

PLEASE INCLUDE DEMOGRAPHICS AND COPY OF INSURANCE WITH THIS FORM

ANTI-INFLAMMATORY CREAMS

1. ☐ MUSCULOSKELETAL PAIN, OSTEOARTHRITIS, EPICONDYLITIS
FLURBUPROFEN 20%, BACLOFEN 2%, CYCLOBENZAPRINE 2%, LIDOCAINE 2%
2. ☐ MUSCULOSKELETAL PAIN & INFLAMMATION
FLURBUPROFEN 20%, BACLOFEN 2%, CYCLOBENZAPRINE 2%, GABAPENTIN 6%, LIDOCAINE 2%
3. ☐ TENDINOSIS, STRICTURE & SCARRING
FLURBUPROFEN 20%, BACLOFEN 2%, VERAPAMIL 10%

SIG: APPLY 1-2 GRAMS TO AFFECTED AREA 3-4 TIMES PER DAY

Please Circle:

QTY: 120 GM 180 GM 240GM

REFILLS 1

NEUROPATHIC PAIN AND POST-HERPETIC NEURALGIA

4. ☐ TRIGEMINAL NEURALGIA, PHANTOM LIMB, DEVELOPING NEUROPATHY
KETAMINE 10% (C-III), GABAPENTIN 6%, IMIPRAMINE 3%, LIDOCAINE 2%, MEFENAMIC ACID 1%, CLONIDINE 0.2%
5. ☐ DIABETIC & CHEMOTHERAPY-INDUCED PERIPHERAL NEUROPATHY
KETAMINE 10% (C-III), GABAPENTIN 6%, IMIPRAMINE 3%, LIDOCAINE 2%, NIFEDIPINE 2%, BACLOFEN 2%
6. ☐ SHINGLES
KETAMINE 10% (C-III), LIDOCAINE 2%, ACYCLOVIR 5%, DDG 0.1%, AMITRIPTYLINE 2%, KETOPROFEN 10%
7. ☐ FAILED BACK SYNDROME, RADICULOPATHY, FIBROMYALGIA
KETAMINE 10% (C-III), BACLOFEN 2%, CYCLOBENZAPRINE 2%, KETOPROFEN 10%, GABAPENTIN 6%, LIDOCAINE 2%

MISCELLANEOUS PRODUCTS

8. ☐ SPRIX NASAL SPRAY (SIG: 1 SPRAY IN EACH NOSTRIL EVERY 6-8 HOURS AS NEEDED FOR PAIN)
FOR THE SHORT TERM (>5 DAYS) RELIEF OR MODERATE TO MODERATELY SEVERE PAIN
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10. ☐ NIP PROCEDURE DEVICE (SIG: DEVICE IS PLACED BEHIND THE EAR OF THE PATIENT FOR 4 DAYS)
NON-DRUG TREATMENT FOR PAIN WITH LITTLE OR NO SIDE-EFFECTS

WORKERS COMPENSATION ONLY

11. ☒ XERO-CIN:
CAPSAICIN 0.025%, METHYL SALICYLATE 25%, MENTHOL 10%, LIDOCAINE 2.5% - 240ML
12. ☒ XERO-K
KETOPROFEN 20%, LIDOCAINE 5% - 180GM
13. ☒ GENICIN: (SIG: TAKE 1 CAPSULE BY MOUTH 3 TIMES DAILY)
GLUCOSAMINE SODIUM 500MG - 90 CAPSULES
14. ☒ SOMNINICIN: (SIG: TAKE 1-2 CAPSULE BY MOUTH AT BEDTIME)
MELATONIN 2MG, 5-HYDROXYTRYPTOPAN 50MG, L-TRYPTOPHAN 100MG, PYRIDOXINE 10MG, MAGNESIUM 50MG - 60 CAPSULES
15. ☒ FLAXACIN: (SIG: TAKE 2 TABLETS BY MOUTH 2 TIMES DAILY "MAX IS 4 TABLETS")
DOCUSATE SODIUM 50MG, SENNOSIDES 8.614G - 100 TABLETS

PRESCRIBER INFORMATION

NAME (PRINT): <u>Harry David Elshire</u>	NPI#: <u>137661 8389</u>	DEA#: <u>FE 324 8829</u>	LIC#: <u>A 40737</u>
ADDRESS: <u>34730 Bob Wilson Dr San Diego</u>	PHONE: <u>858 740 8700</u>	FAX: <u></u>	
PRESCRIBER'S SIGNATURE: <u>[Signature]</u>			DATE: <u>3/19/13</u>

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FLMASS0181

DEF. EX. 3

UNCLASSIFIED

FD-1023	FEDERAL BUREAU OF INVESTIGATION CHS REPORTING DOCUMENT	
HEADER		

Source ID: Redacted
Date: 03/29/2013
Case Agent Name: CONNOLLY, CATHLEEN A
Field Office/Division: San Diego
Squad: WC2

Date of Contact: 03/19/2013
List all Present including yourself. (Do not include the CHS.): SA Cathleen A. Connolly
Type of Contact: Telephonic

Date of Report: 03/19/2013
Substantive Case File Number: Redacted

Source Reporting:

On 03/19/2013, CHS was contacted regarding signing prescriptions for compounding pharmacies. CHS was told the types of medications that would be prescribed, including topical compounded creams and oral glucosamines and non-prescription sleep supplements. CHS authorized SA Cathleen A. Connolly to sign his/her name to the prescriptions for the described medications. CHS provided his/her DEA#, license#, address and phone number to be used on the prescriptions. CHS was told that he/she may receive a phone call to verify the prescription. CHS agreed to verify the prescriptions.

Approval History:

Submitted By:	Connolly, Cathleen A	03/29/2013 5:52PM
Approved By:	Godshall, Bradlee	04/02/2013 6:38PM

FD-1023

Page 1 of 1

FEDERAL BUREAU OF INVESTIGATION

UNCLASSIFIED

DEF. EX. 4

NAP-REPORTS-IFP-000054

NEVADA SECRETARY OF STATE

Barbara K. Cegavske

Search nvsos.gov...

GO

SOS INFORMATION

ELECTIONS

BUSINESSES

LICENSING

INVESTOR INFORMATION

ONLINE SERVICES

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SOUTH CANYON MEDICAL LLC

Q New Search

Printer Friendly

\$ Calculate List Fees

Business Entity Information

Status:	Default	File Date:	11/5/2012
Type:	Domestic Limited-Liability Company	Entity Number:	E0572422012-9
Qualifying State:	NV	List of Officers Due:	11/30/2015
Managed By:	Managing Members	Expiration Date:	
NV Business ID:	NV20121667812	Business License Exp:	11/30/2015

Additional Information

Central Index Key:	
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Registered Agent Information

Name:	UNITED STATES CORPORATION AGENTS, INC.	Address 1:	500 N RAINBOW BLVD STE 300A
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89107
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent - Corporation		
Jurisdiction:	NEVADA	Status:	Active

View all business entities under this registered agent

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
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No stock records found for this company

Officers☐ Include Inactive Officers**Managing Member - JEFFREY P MCMICHAEL**

Address 1:	9450 MIRA MESA BLVD. SUITE C-218	Address 2:	
City:	SAN DIEGO	State:	CA

DEF. EX. 5

Zip Code:	92126	Country:	USA
Status:	Active	Email:	
Managing Member - ALAN WILSON			
Address 1:	9450 MIRA MESA BLVD. SUITE C-218	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92126	Country:	USA
Status:	Active	Email:	

Actions\Amendments
Click here to view 5 actions\amendments associated with this company

Gerald M. Werksman, SBN 145020
17702 Mitchell North,
Irvine, CA 92614
Telephone: 949-307-2426
Facsimile: 949-756-9060
werksmanlaw@gmail.com

Attorney for Defendant Jean Francois Picard

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEAN FRANCOIS PICARD (2),

Defendant.

Criminal Case No. 16cr1409-H

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT:

I, Crystal Amaro, am a citizen of the United States and am at least 18 years of age. My business address is 17702 Mitchell North, Irvine, CA 92614. I am not a party to this case. I have caused service of the attached DEFENDANT'S MOTION TO DISMISS THE INDICTMENT DUE TO OUTRAGOUS GOVERNMENT CONDUCT IN OBTAINING JURISDICTION, ENTRAPPING DEFENDANT, ENHANCING POSSIBLE SENTENCING AND CREATING THE CRIMINAL ACTS on the parties to this case by filing the foregoing with the Clerk of the District Court using its ECF system, which electronically notifies them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2016

/s/ Crystal Amaro

Crystal Amaro

CERTIFICATE OF SERVICE